

**United States District Court  
Northern District of Illinois  
Eastern Division**

JUSTIN E. MANLEY, individually  
and on behalf of all others  
similarly situated,

Plaintiffs,

**V.**

CONSUMER PROTECTION  
DIRECT, INC. d/b/a NATIONAL  
VEHICLE HEADQUARTERS,

Defendant.

Case No. 1:08-cv-03810

Judge Valdez

## JURY TRIAL DEMANDED

**CONSENT MOTION OF CONSUMER PROTECTION DIRECT, INC.  
FOR ADDITIONAL TIME TO RESPOND TO COMPLAINT**

Consumer Protection Direct, Inc. ("CPD"), by its attorneys, pursuant to Rule 6(b) of Federal Rules of Civil Procedure, hereby requests that the Court extend for thirty (30) days the date by which CPD is to respond to Plaintiff's Complaint, from July 28, 2008 to August 28, 2008. In support of this Motion, CPD states:

1. CPD was served with the complaint in this case on July 7, 2008. As a result, without the relief sought by this motion, a response to the complaint would be due on July 28, 2008.

2. Counsel for CPD, located in St. Louis, Missouri was only recently retained by CPD.

3. Counsel for CPD contacted one of the attorneys for the Plaintiff, Dave Butsch, and requested an extension of the time to respond to August 28, 2005. Mr. Butsch agreed to the request.

WHEREFORE, Consumer Protection Direct requests that the Court extend the date by which CPD is to respond to the Complaint to August 28, 2008.

Respectfully submitted,

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*Attorneys for Consumer Protection  
Direct, Inc.*

### **CERTIFICATE OF SERVICE**

The undersigned attorney certifies that on July 23, 2008, the foregoing was served on the following persons by electronic transmission via the Case Management/Electronic Case Filing System of the U.S. District Court for the Northern District of Illinois to:

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